

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Obj. Deadline: Mar. 20, 2025 at 4:00 p.m. ET

**TWENTY SECOND MONTHLY FEE STATEMENT OF ERNST & YOUNG LLP AS
TAX SERVICES PROVIDER TO THE DEBTORS AND DEBTORS-IN-POSSESSION
FOR COMPENSATION FOR PROFESSIONAL SERVICES RENDERED AND
REIMBURSEMENT OF EXPENSES INCURRED FOR THE PERIOD
FROM SEPTEMBER 1, 2024 THROUGH AND INCLUDING SEPTEMBER 30, 2024**

Name of Applicant	Ernst & Young LLP
Authorized to Provide Professional Services to:	the Debtors and Debtors-in-Possession
Date of Retention:	January 17, 2023 <i>nunc pro tunc</i> to November 28, 2022
Period for which compensation and reimbursement is sought:	September 1, 2024 through September 30, 2024
Amount of Compensation sought as actual, reasonable and necessary:	\$983,752.20
80% of Compensation sought as actual, reasonable and necessary:	\$787,001.76
Amount of Expense Reimbursement sought as actual, reasonable, and necessary:	\$36,102.07

This is a(n) **X** monthly ____ interim ____ final application. No prior application has been filed with respect to this Fee Period.

¹ The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

PRIOR MONTHLY FEE STATEMENTS FILED

Dated Filed	Period Covered	Requested Fees	Requested Expenses	Approved Fee	Approved Expenses
D.I. 847 filed on March 10, 2023	November 28, 2023 through December 31, 2023	\$1,264,113.80	\$12,330.63		
D.I. 1500 filed on May 16, 2023	January 1, 2023 through January 31, 2023	\$1,130,705.00	\$32,893.58	\$2,086,386.45	\$43,916.74
D.I. 1627 filed on June 13, 2023	February 1, 2023 through February 28, 2023	\$1,215,238.75	\$10,381.09	Pending	Pending
D.I. 1932 filed on July 27, 2023	March 1, 2023 through March 31, 2023	\$1,596,707.00	\$26,108.75	Pending	Pending
D.I. 2985 filed on October 3, 2023	April 1, 2023 through April 30, 2023	\$1,372,281.75	\$7,276.19	Pending	Pending
D.I. 3377 filed on October 25, 2023	May 1, 2023 through May 31, 2023	\$1,327,255.00	\$17,767.20	Pending	Pending
D.I. 5317 filed on January 3, 2024	June 1, 2023 through June 30, 2023	\$1,428,255.75	\$4,846.35	Pending	Pending
D.I. 12924 filed on April 26, 2024	July 1, 2023 through July 31, 2023	\$1,437,560.80	\$11,469.23	Pending	Pending
D.I. 12925 filed on April 26, 2024	August 1, 2023 through August 31, 2023	\$1,899,489.25	\$21,319.67	Pending	Pending
D.I. 12926 filed on April 26, 2024	September 1, 2023 through September 30, 2023	\$1,356,469.80	\$9,754.18	Pending	Pending

Dated Filed	Period Covered	Requested Fees	Requested Expenses	Approved Fee	Approved Expenses
D.I. 15991 filed on May 28, 2024	October 1, 2023 through October 31, 2023	\$1,518,739.15	\$22,627.72	Pending	Pending
D.I. 15992 filed on May 28, 2024	November 1, 2023 through November 30, 2023	\$1,246,282.20	\$54,286.25	Pending	Pending
D.I. 15993 filed on May 28, 2024	December 1, 2023 through December 31, 2023	\$1,125,361.50	\$40,092.30	Pending	Pending
D.I. 16530 filed on June 3, 2024	January 1, 2024 through January 31, 2024	\$1,479,449.30	\$141,396.07	Pending	Pending
D.I. 16545 filed on June 3, 2024	February 1, 2024 through February 29, 2024	\$1,444,701.70	\$96,102.20	Pending	Pending
D.I. 16548 filed on June 3, 2024	March 1, 2024 through March 31, 2024	\$966,665.10	\$34,889.16	Pending	Pending
D.I. 24500 filed on September 10, 2024	April 1, 2024 through April 30, 2024	\$1,326,416.00	\$69,783.85	Pending	Pending
D.I. 27391 filed on October 30, 2024	May 1, 2024 through May 31, 2024	\$1,542,852.80	\$88,956.07	Pending	Pending

SUMMARY OF BILLING BY PROFESSIONAL
SEPTEMBER 1, 2024 THROUGH AND INCLUDING SEPTEMBER 30, 2024

Name	Type	Rank	Hours	Hourly Rate	Total Individual Fees
Lowery,Kristie L	Billable	National Partner/Principal	21.70	\$ 1,040.00	\$ 22,568.00
McComber,Donna	Billable	National Partner/Principal	1.30	1,040.00	1,352.00
Stevens,Matthew Aaron	Billable	National Partner/Principal	2.20	1,040.00	2,288.00
Bailey,Doug	Billable	Partner/Principal	80.30	866.00	69,539.80
Bastienne,Oliver	Billable	Partner/Principal	2.90	866.00	2,511.40
Buduguntae,Shashanka	Billable	Partner/Principal	7.20	866.00	6,235.20
Ferris,Tara	Billable	Partner/Principal	0.90	866.00	779.40
Herman,Andrew	Billable	Partner/Principal	0.50	866.00	433.00
Leston,Juan	Billable	Partner/Principal	3.50	866.00	3,031.00
Liassides,Petros	Billable	Partner/Principal	1.10	866.00	952.60
Lovelace,Lauren	Billable	Partner/Principal	3.50	866.00	3,031.00
Mehta,Amish	Billable	Partner/Principal	5.90	866.00	5,109.40
Rumford,Neil	Billable	Partner/Principal	0.50	866.00	433.00
Shea JR,Thomas M	Billable	Partner/Principal	3.30	866.00	2,857.80
Socratous,Christoforos	Billable	Partner/Principal	2.00	866.00	1,732.00
Walker,Rachael Leigh Braswell	Billable	Partner/Principal	1.50	866.00	1,299.00
Acharya,Prashant	Billable	Managing Director	0.90	814.00	732.60
Borts,Michael	Billable	Managing Director	3.70	814.00	3,011.80
Bost,Anne	Billable	Managing Director	15.30	814.00	12,454.20
DeVincenzo,Jennie	Billable	Managing Director	10.60	814.00	8,628.40
Dubroff,Andy	Billable	Managing Director	22.50	814.00	18,315.00
Koch,Markus	Billable	Managing Director	0.50	814.00	407.00
Massengill,Clint	Billable	Managing Director	14.00	814.00	11,396.00
Nolan,Bill	Billable	Managing Director	0.90	814.00	732.60
Poloner,Seth	Billable	Managing Director	14.30	814.00	11,640.20
Sargent,Amy Johannah	Billable	Managing Director	1.40	814.00	1,139.60
Schmutter,David	Billable	Managing Director	1.00	814.00	814.00
Watkins,Michael	Billable	Managing Director	8.90	814.00	7,244.60
Berkness,Christopher	Billable	Senior Manager	1.00	683.00	683.00
Berman,Jake	Billable	Senior Manager	24.40	683.00	16,665.20
Dunne,Robert	Billable	Senior Manager	0.20	683.00	136.60
Edwards,Jessica	Billable	Senior Manager	11.10	683.00	7,581.30
Faerber,Anna	Billable	Senior Manager	2.90	683.00	1,980.70
Haas,Zach	Billable	Senior Manager	1.80	683.00	1,229.40
Hammon,David Lane	Billable ²	Senior Manager	68.60	683.00	46,853.80
He,Alva	Billable	Senior Manager	1.50	683.00	1,024.50
Katsnelson,David	Billable	Senior Manager	6.10	683.00	4,166.30
Kyriakides,Stavros	Billable	Senior Manager	11.00	683.00	7,513.00
Lunia,Suraj	Billable	Senior Manager	1.70	683.00	1,161.10
Madrası,Hussain	Billable	Senior Manager	15.00	683.00	10,245.00
McGee,Liz	Billable	Senior Manager	3.80	683.00	2,595.40

Name	Type	Rank	Hours	Hourly Rate	Total Individual Fees
Mistler,Brian M	Billable ²	Senior Manager	6.60	683.00	4,507.80
Musano,Matthew Albert	Billable	Senior Manager	30.80	683.00	21,036.40
Nguyen,Huong	Billable	Senior Manager	5.00	683.00	3,415.00
O'Connell,Dillon	Billable	Senior Manager	0.50	683.00	341.50
Papachristodoulou,Elpida	Billable	Senior Manager	1.80	683.00	1,229.40
Pawa,Kunal	Billable	Senior Manager	5.40	683.00	3,688.20
Pfaff,Arthur	Billable	Senior Manager	1.50	683.00	1,024.50
Porto,Michael	Billable	Senior Manager	8.10	683.00	5,532.30
Schwarzwalder,Christian	Billable	Senior Manager	7.10	683.00	4,849.30
Suzuki,Jason	Billable	Senior Manager	65.20	683.00	44,531.60
T,Venkateswarlu	Billable	Senior Manager	10.30	683.00	7,034.90
Taniguchi,Keisuke	Billable	Senior Manager	8.20	683.00	5,600.60
Tong,Chia-Hui	Billable	Senior Manager	50.40	683.00	34,423.20
Wrenn,Kaitlin Doyle	Billable	Senior Manager	32.40	683.00	22,129.20
Yang,Rachel Sim	Billable	Senior Manager	13.80	683.00	9,425.40
Ancona,Christopher	Billable ²	Manager	70.00	551.00	38,570.00
Billings,Phoebe	Billable	Manager	12.70	551.00	6,997.70
Bouza,Victor	Billable	Manager	10.60	551.00	5,840.60
Carreras,Stephen	Billable	Manager	1.00	551.00	551.00
Chang-Waye,Amanda	Billable	Manager	8.90	551.00	4,903.90
Chawla,Pooja	Billable	Manager	1.30	551.00	716.30
Cushner,Sam	Billable	Manager	12.80	551.00	7,052.80
Davis,Christine	Billable	Manager	12.30	551.00	6,777.30
Davis,Kathleen F.	Billable	Manager	0.20	551.00	110.20
Dugasse,Annie	Billable	Manager	2.90	551.00	1,597.90
French,Jake	Billable	Manager	7.50	551.00	4,132.50
Gorman,Doug	Billable	Manager	76.00	551.00	41,876.00
Hall,Emily Melissa	Billable ²	Manager	110.40	551.00	60,830.40
Katelas,Andreas	Billable	Manager	22.60	551.00	12,452.60
Marlow,Joe	Billable ²	Manager	0.20	551.00	110.20
McPhee,Tiffany	Billable	Manager	5.50	551.00	3,030.50
Mizutani,Rie	Billable	Manager	8.00	551.00	4,408.00
Ossanlou,Nina Shehrezade	Billable	Manager	65.10	551.00	35,870.10
Oyetunde,Oyebode	Billable	Manager	25.50	551.00	14,050.50
Sun,Yuchen	Billable ²	Manager	0.80	551.00	440.80
Tsikkouris,Anastasios	Billable	Manager	4.10	551.00	2,259.10
Van Scoyk,Aeron	Billable	Manager	12.90	551.00	7,107.90
Zheng,Eva	Billable	Manager	25.40	551.00	13,995.40
Agarwal,Akhil	Billable	Senior	2.90	415.00	1,203.50
Aithal,Adithya	Billable	Senior	2.10	415.00	871.50
Asim,Malik Umer	Billable	Senior	6.50	415.00	2,697.50
B,Bharath	Billable	Senior	13.90	415.00	5,768.50
Chachan,Aparajita	Billable	Senior	1.50	415.00	622.50
Choudary,Hira	Billable ²	Senior	34.10	415.00	14,151.50
Di Stefano,Julia	Billable	Senior	9.30	415.00	3,859.50

Name	Type	Rank	Hours	Hourly Rate	Total Individual Fees
Dugasse, Tara	Billable	Senior	2.90	415.00	1,203.50
Frapolly, Brody	Billable ²	Senior	22.30	415.00	9,254.50
Garcia, Casey	Billable	Senior	10.00	415.00	4,150.00
Houareau, Tina	Billable	Senior	10.20	415.00	4,233.00
Huang, Ricki	Billable	Senior	2.50	415.00	1,037.50
Huang, Vanesa	Billable	Senior	0.20	415.00	83.00
Inker, Brian	Billable	Senior	8.70	415.00	3,610.50
MacLean, Corrie	Billable	Senior	70.30	415.00	29,174.50
Michael, Yiannis	Billable	Senior	1.70	415.00	705.50
Molnar, Evgeniya	Billable	Senior	2.80	415.00	1,162.00
Murray, Sarah	Billable	Senior	0.20	415.00	83.00
Neziroski, David	Billable ²	Consultant	41.10	445.00	18,289.50
Pastrikou, Eleni	Billable ²	Senior	2.20	415.00	913.00
Perez, Ellen Joy	Billable	Senior	11.50	415.00	4,772.50
R, Mukesh	Billable	Senior	19.20	415.00	7,968.00
Sakaguchi, Masato	Billable	Senior	98.90	415.00	41,043.50
Sangster, Mark	Billable	Senior	1.20	415.00	498.00
Tokuda, Keisuke	Billable	Senior	3.50	415.00	1,452.50
Vasic, Dajana	Billable	Staff	5.60	236.00	1,321.60
Wickramasinghe, Madhangha	Billable	Senior	1.60	415.00	664.00
Yang, Ming	Billable	Senior	0.50	415.00	207.50
Zhuo, Melody	Billable ²	Senior	63.50	415.00	26,352.50
Allen, Jenevier Michelle	Billable	Staff	2.70	236.00	637.20
Balassiano, Sarah	Billable	Staff	10.40	236.00	2,454.40
Bruno, Hannah	Billable	Staff	7.00	236.00	1,652.00
Charalambous, Chrysanthos	Billable	Staff	3.50	236.00	826.00
Chen, Zhu En	Billable	Staff	13.70	236.00	3,233.20
Choque, Steven	Billable	Staff	15.80	236.00	3,728.80
Feliciano, Christopher	Billable	Staff	12.40	236.00	2,926.40
Gebreselassie, Abraham	Billable	Staff	0.30	236.00	70.80
Geisler, Arthur	Billable	Staff	26.90	236.00	6,348.40
Louie, Alexis P	Billable	Staff	0.90	236.00	212.40
Mensah, Josephine	Billable	Staff	40.70	236.00	9,605.20
Mok, Wan Ling	Billable	Staff	7.20	236.00	1,699.20
Mould Parga, Joaquin	Billable	Staff	1.20	236.00	283.20
Sarte, Angel Lyne	Billable	Staff	1.00	236.00	236.00
Steiner, Jan	Billable	Staff	7.50	236.00	1,770.00
Scott, James	Billable	Client Serving Contractor JS	17.70	600.00	10,620.00
Bieganski, Walter	Billable	Client Serving Contractor WB	25.70	200.00	5,140.00
Totals			1,772.70		\$983,752.20

¹ Travel fees are billed out at 50% bill rate

Blended Hourly Rate: \$554.95

STATEMENT OF FEES BY PROJECT CATEGORY
SEPTEMBER 1, 2024 THROUGH AND INCLUDING SEPTEMBER 30, 2024

Project Category	Project Category Description	Hours	Fees
ACR Bookkeeping/ACR Statutory Reporting	This category includes time spent compile information provided by client, the annual balance sheet, and related statements of income, retained earnings, and cash flows in accordance with the International Standard on Related Services (ISRS) 4410 (Revised), Compilation Engagements, or local regulatory requirements, as appropriate. This is to assist client in presenting financial information in the form of financial statements	233.00	\$ 107,335.30
Fee/Employment Applications	This category relates to the preparation of EY's employment application and planning and coordinating the professionals' time protocols, preparation of monthly fee statements, preparation of interim fee applications, invoices, and responding to inquiries	46.60	21,434.40
Information Reporting	Reporting of income paid to certain US-based investors, vendors, and independent contractors	20.00	14,759.30
IRS Audit Matters	Responding to the inquiries of the IRS related to current/prior tax years.	3.80	2,595.40
Non US Tax	Taxation of all non-US based or related activities and taxpayers	425.30	241,445.80
Payroll Tax	Taxation of Global and US-based payroll and employment tax requirements	68.20	55,411.60
Project Management Office Transition	Preparation for, attendance at and participation in periodic meetings, discussions and analyses regarding coordination of EY services and international teams in order to align on information, assumptions, and issues.	141.20	79,954.00
Tax Advisory	The projects covered by on-call tax advisory services include assistance with tax issues by answering one-off questions, drafting memos describing how specific tax rules work, assisting with general transactional issues, and assisting Client in connection with International Tax Services dealings with tax authorities (other than representing Client in an examination or an appeal before the IRS or other taxing authority).	127.10	100,142.10
Technology	Ingestion, transformation, and analysis of FTX data to be leveraged by the tax workstreams in order to facilitate the preparation and completion of deliverables.	84.10	47,408.30
Transfer Pricing	Determine arm's length pricing in related-party transactions	86.90	47,335.90
US Income Tax	Taxation of all US-based or related activities and taxpayers	113.20	59,626.80
US International Tax	Taxation of all non-US based or related activities as it impacts on US based taxpayers	179.60	78,259.50

Project Category	Project Category Description	Hours	Fees
US State and Local Tax	Taxation of all US-based or related activities and taxpayers as assessed by each state and local jurisdiction	229.10	122,612.30
Value Added Tax	Taxation of non-US based indirect based or related activities and taxpayers	14.60	5,431.50
Total		1,772.70	\$983,752.20

SUMMARY OF ACTUAL AND NECESSARY EXPENSES

Expense Category	Expense Amount
IT Data	\$ 31,815.00
Technology Support	3,887.73
VAT	399.34
Total	\$ 36,102.07

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,²

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

**TWENTY SECOND MONTHLY FEE STATEMENT OF ERNST & YOUNG LLP AS
TAX SERVICES PROVIDER TO THE DEBTORS AND DEBTORS-IN-POSSESSION
FOR COMPENSATION FOR PROFESSIONAL SERVICES RENDERED AND
REIMBURSEMENT OF EXPENSES INCURRED FOR THE PERIOD
FROM SEPTEMBER 1, 2024 THROUGH AND SEPTEMBER 30, 2024**

Ernst & Young LLP (“EY LLP”), Tax Services Provider to FTX Trading Ltd. and its affiliated debtors and debtors-in-possession in the above-captioned cases (collectively, the “Debtors”), hereby submits this twenty second monthly fee statement (this “Monthly Fee Statement”) for compensation for professional services rendered and expenses incurred for the period from September 1, 2024 through and including September 30, 2024 (the “Fee Period”).

In support of the Monthly Fee Statement, EY LLP respectfully states as follows:

Background

1. On November 11 and November 14, 2022,³ the Debtors filed with the United States Bankruptcy Court for the District of Delaware (the “Court”) voluntary petitions for relief under title 11 of the United States Code, 11 U.S.C. §§ 101 *et seq.* (as amended or modified, the “Bankruptcy Code”). From November 11, 2022 through January 3, 2025, the Debtors operated their businesses and managed their properties as debtors-in-possession pursuant to

² The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

³ November 11, 2022 is the petition date for all Debtors, except for Debtor West Realm Shires Inc.

sections 1107(a) and 1108 of the Bankruptcy Code. Joint administration of the Debtors' cases (the “Chapter 11 Cases”) was authorized by the Court by entry of an order on November 22, 2022 [D.I. 128]. On December 15, 2022, the Office of the United States Trustee for the District of Delaware (the “U.S. Trustee”) appointed an Official Committee of Unsecured Creditors (the “Committee”) pursuant to section 1102 of the Bankruptcy Code [D.I. 231].

2. On January 17, 2023, the Court entered the *Order Authorizing the Retention and Employment of EY LLP as Tax Services Provider Nunc Pro Tunc to November 28, 2022* [D.I. 505] authorizing the retention and employment of EY LLP as the Debtors' Tax Services Provider, *nunc pro tunc* to November 28, 2022.

3. On January 9, 2023, the Court entered the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [D.I. 435] (the “Interim Compensation Order”).

4. On March 8, 2023, the Court entered the *Order (I) Appointing Fee Examiner and (II) Establishing Procedures for Consideration of Requested Fee Compensation and Reimbursement of Expenses* [D.I. 834] appointing Katherine Stadler (the “Fee Examiner”) to serve as the fee examiner in these Chapter 11 Cases and establishing certain procedures in connection therewith.

5. On October 8, 2024, the Court entered the *Findings of Fact, Conclusions of Law and Order Confirming the Second Amended Joint Chapter 11 Plan of Reorganization of FTX Trading Ltd. and its Debtor Affiliates* [D.I. 26404] (the “Confirmation Order”) confirming the *Second Amended Joint Chapter 11 Plan of Reorganization of FTX Trading Ltd. and its Debtor Affiliates* (the “Plan”).

6. On January 3, 2025, the Plan went effective. See [D.I. 29197].

Relief Requested

7. By this Monthly Fee Statement and in accordance with the Interim

Compensation Order, EY LLP makes this application for (i) allowance of compensation as an administrative expense of the Debtors' estates in the amount of \$983,752.20 for reasonable and necessary professional services rendered, (ii) payment of compensation in the amount of 80% thereof (in the amount of \$787,001.76) and (iii) payment of \$36,102.07 for actual and necessary expenses incurred.

a. Compensation Requested

8. The services performed by EY LLP during the Fee Period included tax services. Attached hereto as Exhibit A is a detailed itemization, by project category, of all services performed by EY LLP with respect to the Chapter 11 Cases during the Fee Period. This detailed itemization complies with Local Rule 2016-1 in that each time entry contains a separate time allotment, a description of the type of activity and the subject matter of the activity, all time is billed in increments of one-tenth (1/10) of an hour, time entries are presented chronologically in categories, and all meetings or hearings are individually identified.

9. The timekeepers who rendered services related to each category are identified in Exhibit A, along with the number of hours for each individual and the total compensation sought by each category. All services for which EY LLP requests compensation were performed for, or on behalf of, the Debtors.

b. Expense Reimbursement

10. EY LLP incurred out-of-pocket expenses during the Fee Period in the amount of \$36,102.07. Attached hereto as Exhibit B is a description of the expenses actually incurred by EY LLP in the performance of services rendered as Tax Services Provider to the Debtors. The expenses are broken down into categories of charges, which may include, among other things, the following charges: airfare, lodging, ground transportation, working meals, and other expenses. Value Added Tax ("VAT") is a consumption tax in which certain foreign firms

are required by local tax authority regulations to charge for services performed during this engagement.

11. In accordance with section 330 of the Bankruptcy Code, EY LLP seeks reimbursement only for the actual cost of such expenses to EY LLP. EY LLP submits that all such expenses incurred were customary, necessary and related to the Chapter 11 Cases and, by this Monthly Fee Statement, requests reimbursement of the same.

Valuation of Services

12. Professionals of EY LLP have expended a total of 1,772.70 hours in connection with this matter during the Fee Period.

13. The amount of time spent by each of the professionals' providing services to the Debtors for the Fee Period is set forth in Exhibit A. The rates are EY LLP's normal hourly rates of compensation for work of this character. The reasonable value of the services rendered by EY LLP for the Fee Period as Tax Services Provider for the Debtors in the Chapter 11 Cases is \$983,752.20.

14. EY LLP believes that the time entries included in Exhibit A attached hereto and the expense breakdown set forth in Exhibit B attached hereto are in compliance with the requirements of Local Rule 2016-1.

15. In accordance with the factors enumerated in section 330 of the Bankruptcy Code, the amount requested is fair and reasonable given the complexities of these Chapter 11 Cases, the time expended, the nature and extent of the services rendered, the value of such services, and the costs of comparable services other than in a case under this title.

Certificate of Compliance and Waiver

16. The undersigned representative of EY LLP certifies that he has reviewed

the requirements of Local Rules 2016-1 and that the Monthly Fee Statement substantially complies with such rule. To the extent that the Monthly Fee Statement does not comply in all respects with the requirements of Local Rule 2016-1, EY LLP believes that such deviations are not material and respectfully requests that any such requirements be waived.

Notice and No Prior Request

17. Notice of this Monthly Fee Statement has been given to the following parties or, in lieu of, to their counsel, if known: (a) the U.S. Trustee; (b) the Official Committee of Unsecured Creditors and (d) all parties required to be given notice in the Interim Compensation Order. EY LLP submits that no other or further notice is necessary.

18. No prior request for the relief sought in this Monthly Fee Statement has been made to this or any other Court.

WHEREFORE, EY LLP respectfully requests that the Bankruptcy Court
(i) approve the Monthly Fee Statement and (ii) grant such further relief as is just and proper.

Dated: February 28, 2025
New York, NY

/s/ Thomas M. Shea
Thomas M. Shea
Partner/Principal
Ernst & Young LLP